

# **RECORD RETENTION PERIODS FOR MONTANA STATE-CHARTERED BANKS**

## **APPENDIX “A” TO MONTANA ADMINISTRATIVE RULE 8.80.111 RETENTION OF BANK RECORDS**

**Proposed: July 27, 2006**

This Appendix lists minimum retention periods for many types of bank records. The list is not all-inclusive, but includes most common types of corporate, accounting and customer relationship records maintained by credit unions. For ease of reference, records may be listed under more than one heading. If a retention conflict exists between the rule and other laws or rules, whether federal or state, the law or rule requiring the longer retention period shall govern.

For those records not listed in this publication, there may be specific other laws that govern (personnel records for example). If no other specific guidance exists, credit union management should establish appropriate retention periods, in consultation with the bank’s board of directors and bank's counsel when appropriate.

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**NOTE:** ACC = After Account Closed

## BANKS

### Accounting Records

### Retention Guidelines

Accrual Records	3 years
Annual Statement of Condition	Permanent
Annual Statement of Operations	Permanent
Asset/Liability Management records	3 years
Audit (internal and external) Report	6 years
Audit (internal) work papers	3 years
Bank Statements from depository banks	6 years
Budget Report	2 years
Call Reports	Permanent
Charged-off asset records	Permanent
Currency Transaction Reports	5 years
Deferred Loan Fee Record	2 years after examination
Depreciation records	3 years after life of asset
Dormant account records	Permanent
Escheated Documents	Permanent
FDIC assessment base records	5 years
Fixed Assets Inventory	2 years
General Ledger	Permanent
General ledger tickets	5 years
General Ledger Transaction Report	5 years
Interest Checks (paid)	6 years
Journal Entries	6 years

Legal Reserve requirement computations	2 years
Money Orders (paid)	6 years
Monthly Loans Purchased Report	6 years
Monthly Loans Sold Report	6 years
Other real estate owned transaction history	7 years
Overdraft reports	5 years
Paid Bills and invoices	7 years
Savings Interest/Dividend Posting Report	2 years
Statement of Condition, including balance Sheet and income statement:	
Daily	2 years
Annual	Permanent
Teller Balancing Records	2 years
Wire transfers – debits and credits	5 years

### **Administrative and Corporate Records**

### **Retention Guidelines**

Affidavits	7 years
Annual Reports to Shareholders	Permanent
Articles of Incorporation	Permanent
Attachments (garnishments, liens, levies)	4 years after close
Audit Reports (External)	6 years
Audit Reports (Internal)	6 years
Ballots and Proxies	6 years
Bank Examiners' Records	Permanent
Branch Applications	Permanent
Charitable contributions	7 years
Civil Actions	7 years
CRA Compliance Records	2 years
Contracts and leases	6 years after termination
Corporate Bylaws	Permanent
Corporate charter	Permanent
Court case records	4 years after satisfaction
Court Orders	After satisfaction
Currency Transaction Reports	5 years
Directors reports (if separate from minutes)	3 years
Dividend Items:	
Checks (paid)	6 years
Dividend Register	6 years
Nominee information return (1099 DIV)	7 years
Taxpayer identification number certification (W-9)	5 years after close

Examination Reports	Permanent
Executive Committee Reports (if separate from minutes)	3 years
Executive Officers and Principal Shareholders	
Indebtedness to Correspondent Banks Record	3 years
FHLB Membership Certificate	Permanent
Insurance Records:	
Bankers blanket bond	6 years after expiration
Claims	7 years after expiration
D & O liability policy	6 years after expiration
Group disability policy	6 years after expiration
Licenses and Permits	7 years after expiration
Loans to executive officers and directors	
and principal shareholders	3 years
Minutes books (Directors, stockholder records, etc.)	Permanent
Proxies	6 years
Receipts for Stock Certificates	Permanent
Statement of Beneficial Ownership	Permanent
Statement of changes in Beneficial Ownership	Permanent
Statement of interest (outside business interests of	
directors, executive officers and principal shareholders)	3 years
Stock certificates, records and stubs	Permanent
Stock Ledger	Permanent
Stock Transfer Register	Permanent
Stockholder List	Permanent
Tax Returns/Reports	7 years

### **Bank Borrowings**

### **Retention Guidelines**

Borrowing Agreements	2 years after expiration
Collateral Receipts	3 years after payoff
Correspondence	2 years after payoff
Notes	2 years after maturity
Verification	2 years after payoff
Withdrawal Receipts	2 years after payoff

**Bank Cards/Debit Cards****Retention Guidelines**

Account History	6 years AAC
Applications:	
Approved	6 years AAC
Denied	25 months
Charged-off loan records	Permanent
Correspondence	3 years
Credit files	3 years
Disclosure statements	2 years
Merchant agreements	6 years
Payment records	6 years
Sales tickets or drafts:	
By-product of posting	2 years
Used as original entry	6 years
Statements:	
Cardholder	6 years
Merchants	6 years
Transaction journals:	
By-product of posting	2 years
Used as original entry	6 years
Trial Balances	3 years

**Collateral****Retention Guidelines**

Collateral receipts	2 years after payoff
Collateral register	4 years
Pledge agreement	2 years AAC

**Collections****Retention Guidelines**

Collection letters and receipts (incoming and outgoing)	2 years
Collection register	3 years
Collection note register	2 years after close
Coupon cash letters (outgoing)	6 months
List of cash items	1 year after collection
Savings bond records	3 years

**Customer Deposit Accounts:****Certificates of Deposit****Retention Guidelines**

Certificates, after term	7 years
Change of address records	1 year
Copy of certificate	Until closed
Form 1099	2 years
Form 5498	7 years
Form 5035	5 years after closed
Interest checks (paid)	5 years
Interest Check Register (after paid)	1 year
Ledger Cards, Computer Cards, Reports	5 years
Reconcilement to general ledger	3 years
Records of purchase and redemption	5 years
Safekeeping receipts	3 years AAC
Signature Cards	6 years AAC
Tax I.D. Numbers, after redemption	6 years
Transaction Journal:	
By-Product of Posting	2 years
Used as Original Entry	6 years
Trial Balance	5 years
W-2P	7 years
Withdrawal Request:	
By-Product of Posting	2 years
Used as Original Entry	6 years
Year-end statement	7 years

**Transaction Accounts****Retention Guidelines**

Account Analysis	1 year
Change of address records	1 year
Checks Paid (Microfilm/Microfiche)	5 years
Credit Tickets	5 years
Currency Transaction Reports	5 years
Daily Report of Overdraft	4 years
Debit Ticket	6 years
Debit Tickets/Credit Items (Microfilm/Microfiche)	5 years
Deposit Tickets (Microfilm/Microfiche):	
By-product of posting	2 years

Used as original entry	6 years
Dormant accounts, after escheatment	Permanent
Name and Address Changes	2 years
Night Depository:	
Contract	2 years AAC
Daily record	1 year
Signature card	2 years AAC
Overdraft trial balance	5 years
Power of attorney	5 years AAC or
	Power of attorney revoked
Records of unclaimed or unidentified deposits	6 years
Regulation CC, evidence of compliance	3 years
Return item records	5 years
Service Charge Reports	2 years
Short Lists (Checks Charged in Total to Customer Account)	2 years
Signature Cards (Closed Accounts)	6 years AAC
Statements	5 years
Statement Receipt Cards (On US Check listing)	5 years
Stop- Payment Orders :	
By-product of posting	2 years
Used as original entry	5 years
Taxpayer I.D. numbers	6 years AAC
Transaction Journal, used as original entry	6 years
TT and L Records	2 years
Trial balance	4 years
Uncollected Funds Report	6 years
Undelivered Statements and Cancelled Checks	6 years
Unposted item records	
(e.g. stop payments, holds, NSF checks)	5 years
Wire Transfer Debit/Credit Entries	6 years

## **Savings Accounts**

## **Retention Guidelines**

Canceled Passbooks	Destroy
Deposit Ticket:	
By-Product of Posting	2 years
Used as Original Entry	6 years
Dormant Account records, after escheatment	Permanent
Earnings Posted Journal	2 years

File Maintenance Worksheets	2 years
Form 1099	2 years
In-House Savings Transfer	2 years
IRA Account Records	6 years AAC
Ledger Cards:	
By-Product of Posting	2 years
Used as Original Entry	6 years
Loans on Savings Accounts:	
Account History	7 years after term
Loan File	2 years after term
Promissory Note	2 years after term
New and Closed Account Reports	1 year
Night Deposit:	
Contract	2 years after closing
Daily Record	1 year after closing
Signature Card	2 years after closing
Savings dormancy reports	2 years
Savings exception reports	2 years
Savings interest check register	3 years
Signature cards (closed accounts)	6 years AAC
Statements	5 years
Taxpayer I.D. numbers	6 years AAC
Transaction Journals:	
By-Product of Posting	2 years
Used as Original Entry	6 years
Trial Balance	1 year
Withdrawal Receipts:	
By- Product of Posting	2 years
Used as Original Entry	6 years

### **Due From Bank Accounts**

### **Retention Guidelines**

Advices	2 years
Drafts	1 year after paid
Reconcilement Register	3 years
Statements	2 years

### **Electronic Data Processing**

### **Retention Guidelines**

Computer Control Report	1 year
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Computer Entry Journal	1 year
Computer Files:	
On-line CRT	3 cycles
On-line Terminals	3 cycles
Computer Ledger Control	1 year
Computer Reject Listing	1 year
Computer Transaction Journal	1 year
Internal Control Documents:	
Computer Operating Logs	3 months after examination
Input and Output Logs	3 months after examination
Run Books	3 months after examination
Overdraft Notices and Reports	1 year
Program Documentation:	
Operator Instructions	Life of Program + 1 year
Program Change Log	Life of Program + 1 year
Program Modifications	Life of Program + 1 year
Program Test Data and Results	Life of Program + 1 year
Supporting Program Documentation	Life of Program + 1 year
Regulation E, evidence with compliance	2 years
Tape Retention:	
Application Interface Tapes	5 cycles + 7 days
Application Month-end Fiche Tapes	2 cycles + 60 days
Application Transaction Tapes	5 cycles + 7 days
Daily Application Backups	5 cycles + 7 days
Fiche Tapes	3 cycles + 3 days
Month-end Application Backups	13 cycles
System Backups	5 cycles + 7 days
Year-end Application Backups	7 years
Transactions Records:	
Discs	3 cycles
Magnetic Cards, Cells, Drums, Tapes	3 cycles
Uncollected Accounts Report	3 months

### Electronic Funds Transfers

### Retention Guidelines

Error resolution log	2 years
Regulation E, evidence of compliance	2 years
Wire copies or advices	5 years
Wire Transfer debit and credit entries	5 years
Wire Transfer log	5 years

**Fixed Assets****Retention Guidelines**

Building Contracts, Sub-Contracts, Waivers	7 years
Deeds	Life + 2 years
Depreciation Schedules	Life + 6 years
Insurance Policies	Term and Claim Period
Inventory Records	Life + 6 years
Invoices	Life + 6 years
Leases	Life + 6 years
Maintenance Contracts	Life + 2 years

**Investments****Retention Guidelines**

Bond amortization records	6 years
Bond appraisals	3 years
Bond ledger and portfolio:	
Confirmations	3 years
Correspondence	3 years
Safekeeping records and receipts	4 years
Brokers' invoice	3 years
Brokers' statements	3 years
Commercial Paper:	
Brokers' advice	2 years after maturity
Purchase order	2 years after maturity
Remittance advice	2 years after maturity
Credit information used to evaluate securities	3 years
Descriptive literature on securities	3 years
Discount brokerage account records	3 years
FHLMC loan files	Permanent
GNMA certificates	7 years after maturity or sale
Government securities broker/dealer	
Form G-FIN-4	3 years AAC
Lost or stolen securities (Form X-17-1A)	3 years
Monthly remittance reports	7 years after maturity
Mortgage backed securities:	
Buy and sell agreement	3 years after maturity
Commitment letter	3 years after maturity
Municipal Securities Dealer Arrangement	

(Forms MSD-4, MSD-5, G-FIN 4 and G-Fin 5)	3 years after employment
Public Funds Contract	4 years after close
Safekeeping records and receipts	4 years
Securities transaction records	3 years

## **Loans:**

### **Commercial Loans**

### **Retention Guidelines**

Annual financial reports and customer operating statements	6 years
Applications:	
Approved	6 years AAC
Denied	25 months
Appraisals	1 year AAC
Bankruptcy Notices	Permanent
Borrowers' financial statements	6 years AAC
Charged-Off Records	Permanent
Collateral Pledge Agreements	2 years AAC
Correspondence	6 years AAC
Credit Files	5 years AAC
Debit and credit tickets	1 year
Disbursements vouchers	6 years
Disclosure records	3 years
Evidence of compliance with:	
Regulation B	25 months
Regulation U	3 years
Regulation Z	2 years
Federal Reserve Forms G-3, T-4, U-1	3 years AAC
Hypothecation agreements	6 years AAC
Judgments	20 years
Liability Ledger:	
By-product of posting	2 years
Used as original entry	6 years
Loan committee minutes	6 years
Loan Histories	6 years AAC
Note (Paid)	6 years AAC
Note register:	
By-product of posting`	2 years
Used as original entry	6 years
Overdraft loan agreement	6 years AAC

Participation agreement	6 years AAC
Pledge agreement	6 years
Repossession log and records	6 years
Transaction journal:	
By-product of posting	2 years
Used as original entry	6 years
Trial balance	4 years

## Consumer Loans

## Retention Guidelines

Applications:	
Approved	6 years AAC
Denied	25 months
Bankruptcy Notices	Permanent
Borrowers' financial statements	3 years
Canceled notes	3 years
Charged-Off-Notes and Records	Permanent
Collateral Records and Receipts	5 years AAC
Consumer Credit Drafts	6 years
Correspondence	3 years
Credit Files	5 years AAC
Credit Information Cards	3 years
Daily Proof Sheets	1 year
Dealer Commitment Letters	7 years
Dealer Remittance Sheets	1 year
Dealer Reserve Reports	7 years
Disclosure Statements	2 years
Evidence of compliance with:	
Regulation B	25 months
Regulation U	3 years
Regulation Z	2 years
Insurance verification	7 years AAC
Liability Ledger	6 years
Loan committee report	6 years AAC
Loans paid report	6 years
Loan Payment Coupons	6 years
Loan Worksheet	7 years
New loan journal	6 years
Note or discount tickler	2 years
Note Register:	

By-Product of Posting	2 years
Used as Original Entry	6 years
Notice of Adverse Action	25 months
Overdraft Loan Agreement	6 years AAC
Paid Out Ledger Card	6 years
Rebate Receipt	6 years
Statement of Purpose (loans over \$10,000)	5 years AAC
Student Loan Records	5 years AAC
Transaction Journals:	
By- Product of Posting	2 years
Used as Original Entry	6 years
Trial Balance	4 years

## Real Estate Loans

## Retention Guidelines

Applications:	
Approved	6 years AAC
Denied	25 months
Appraisals	1 year AAC
Assumptions:	
Assignment of escrow	Life of loan
Assumption letter	Life of loan
Annual reports and customer statements	6 years AAC
Change of address records	1 year
Charged-off records	Permanent
Collateral files	5 years AAC
Commitment letters	5 years AAC
Construction loan forms:	
Construction progress certification	7 years AAC
Contractor's cost breakdown	7 years AAC
Final inspection	7 years AAC
Loan in progress card	7 years AAC
Orders to pay contractor or vendor	7 years AAC
Residential construction inspection cards	7 years AAC
Specifications and lists of materials	7 years AAC
Correspondence	3 years AAC
Credit files	5 years AAC
Deed of trust	7 years AAC
Evidence of compliance with:	
Community Reinvestment Act	2 years AAC

Fair Credit Reporting Act	25 months AAC
Home Mortgage Disclosure Act (Regulation C)	5 years AAC
Real Estate Settlement Procedures Act	
Regulation X	2 years AAC
Regulation Z	2 years
FHA bank statements	5 years
Flood insurance certificate	Life of loan
Insurance policies	1 year after expiration
Ledger Cards	6 years AAC
Lenders request of termination of home mortgage insurance	7 years AAC
Liability ledgers:	
By-product of posting	2 years AAC
Used as original entry	6 years AAC
Loan agreement	5 years AAC
Loan committee minutes	6 years
Loan origination case file (HUD/FHA)	2 years AAC
Loan settlement statement	7 years AAC
Loan subordination agreement	7 years AAC
Mortgage	7 years AAC
Mortgage extension agreement	7 years AAC
Mortgage payment coupons	1 year
Mortgage receipts	1 year
Notice of adverse action	25 months
Payoff statement	6 months
Payment history record	5 years AAC
Promissory note	7 years AAC
Property insurance certification	7 years AAC
Remittances, serviced mortgages	6 years AAC
Request for verification of deposit	7 years AAC
Statement of estimated settlement charges	7 years AAC
Tax bills	Life of loan
Transaction journal:	
By-product of posting	2 years
Used as original entry	6 years
Trial balance	4 years

**Official Checks, Drafts, Certified Checks****Retention Guidelines**

Affidavits, Bonds of indemnity and all pertinent information pertaining to issuance of duplicate checks	5 years after paid
All official checks – copy	Until paid
Cashiers check – paid	6 years
Cashiers check register, after payment:	
By-product of posting	2 years
Used as original entry	6 years
Certified Checks or Receipts, Paid	6 years
Certified check Register (after payment)	
By-Product of Posting	2 years
Used as Original Entry	6 years
Drafts paid	6 years
Drafts register, after payment:	
By-product of posting	2 years
Used as original entry	6 years
Expense Checks, Paid	6 years
Expense Checks Register:	
By-product of posting	2 years
Used as original entry	6 years
Expense Vouchers Debit Invoices	6 years
Interest and Dividend Checks, Paid	6 years
Money Orders, Bank or Personal, Paid	6 years
Money Order Register (after payment)	
By-Product of Posting	2 years
Used as Original Entry	6 years
Stop Payment Records	5 years
Travelers checks:	
Receipt of Consigned Traveler's Checks	2 years
Reconciliation	2 years
Sales and Inventory Register	2 years
Stop Payments	5 years
Traveler's Checks (agency purchase)	2 years

**Other Real Estate Owned****Retention Guidelines**

Accounting Records	6 years after sale
Deeds	Until sold
Insurance Policies	2 years after expiration
Lease and Rental Agreements	2 years after term of agreement
Maintenance Contracts	2 years after term of contract
Other Real Estate Owned Files	6 years after sale
Other Real Estate Owned Income and Expense Records	6 years

**Proof, Clearings and Transit****Retention Guidelines**

Advices of corrections to deposits	2 years
Balancing Forms	2 years
Clearinghouse settlement sheets	2 years
Copies of advices of corrections	2 years
Corrections and adjustments	6 months
Departmental or teller's proof sheets	1 year
Deposit proof sheets or tapes	1 year
In clearing envelope, proof sheets or tapes	1 year
Out clearing (cash letters) proof sheets or tapes	1 year
Proof sheets, transit	1 year
Return item letters, checks not paid	1 year

**Safe Deposit****Retention Guidelines**

Access records	4 years
Copies of rent receipts	2 years
Inventory of box contents	2 years after close
Leases or contracts	4 years after close
Signature cards	5 years after close
Wills of deceased tenant	2 years

**Security****Retention Guidelines**

Evidence of compliance with standards for installation of security devices (Regulation P)	2 years
Management certification of compliance with Bank Protection Act	3 years
Reports of robberies, burglaries, nonemployee larcenies committed or attempted	Permanent



**Tellers****Retention Guidelines**

Bank by mail envelopes	6 months
Cash reconciliation to general ledger	3 years
Currency transaction reports	5 years
Night Depository agreements	2 years after closed
Night depository envelopes	6 months
Night depository log	2 years
Tellers' cash tickets	5 years
Tellers' difference/outage record	2 years
Tellers' individual balancing sheets	2 years
Tellers' machine tapes	2 years
Vault records	1 year

**Trusts****Retention Guidelines**

Agreements	Permanent
Amortization schedules	After maturity
Appraisals	10 years
Bond ledger	6 years
Cancelled bonds and coupons	After account closing
Cancelled stock certificate	7 years; return to company
Change of address	1 year
Correspondence:	
Decedent's personal records	1 year AAC
Fees	7 years
Files	3 years AAC
Trust correspondence	Permanent
Corporate trust ledger	Permanent
Coupon envelopes	3 years
Coupon ledgers	Permanent
Directives	Permanent
Dividend check tapes	4 months
Dividend and interest listing	1 year
Dividend ledgers	7 years
Dividend and registered bond interest checks	7 years
Dividend report cards	7 years after closing
Form 1096	3 years after filing
Form 1099	3 years after filing

General department records:	
Accounting for fiduciaries	Permanent
Account reviews	7 years AAC
Account synopsis	7 years AAC
Agency agreements	Permanent
Audit reports	7 years
Buy and sale orders	7 years
Court agreements	Permanent
General correspondence	3 years
Inventory and safe deposit box release	5 years
Miscellaneous:	
Legal opinions	Permanent
Paid bills	6 years
Minute books (trust committee and	
trust investment committee)	Permanent
Notes, mortgages and contracts	Return to customer when
	paid in full
Original trust entries (daily debits and credits)	3 years
Receipt or assets delivered after closing	7 years
Registered journals	Permanent
Registered mail report	3 years
Run statements	1 year
Safekeeping receipts (cancelled)	7 years
Safekeeping inventory	7 years
Signature files	7 years
Stockholders ledgers	Permanent
Stockholders listings	3 years
Stock transfer instructions	7 years
Stock transfer receipts	Permanent
Stop payment instructions	After closing
Stop payment orders	7 years
Supporting papers to transfers	7 years
Surety bonds	7 years return to co.
Tickler cards	1 year AAC
Transfer sheets/ledger	Permanent
Trust agreements	Permanent
Trustee bank statements	6 years
Vault withdrawal and deposit tickets	6 years

**Personal Trusts****Retention Guidelines**

Accounting ledgers	Permanent
Appraisals	10 years
Asset listing (computer)	Permanent
Asset pricing list	2 years
Cash and asset detail per account	Permanent
Cash listing	Permanent
Cash registers	1 year
Check requisitions	1 year
Check vouchers ( probate accounts)	6 years AAC
Checks	Permanent
Claims and research	7 years
Common trust fund violations	Permanent
Comptroller reports	Permanent
Daily department balances control sheets	7 years
Daily blotter of transactions	18 months
Daily settlement of department	3 years
Directives	Permanent
Escheatment reports	Permanent
Fee ledgers	Destroy AAC
Fee schedules	3 years
Fee outstanding	7 years
Income receipt listings	6 years
Journals	5 years
Nominee records	7 years
Overdraft listing	1 year
Pledge reports	7 years
Posting tickets	3 years
Purchase and sale:	
Broker confirmations	7 years
Broker statements	7 years
Investment review	Permanent
Real estate and mortgage documents	7 years
Security and trust analysis	7 years
Trust	Permanent
Special files:	
Ad valorem tax returns	2 years after filing
Estate tax return	15 years after filing

Federal and state tax returns	10 years after filing
Final statement of account	Permanent
Historical activity statements	Permanent
Intangible tax returns	2 years after filing
Social security returns	5 years after filing
Trust returns	Permanent
Suspense reports	7 years